

## Professional Practices

	<p>Stores Pharmacy Operations Manual <i>Policy No. ROPP-0001</i> Date Effective: 8/98 Updated 9/04/2003 Updated 12/21/2004</p>	<p><b>Policy &amp; Procedure</b></p>
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Title: Professional Practices

Purpose: To list the responsibilities and practices that CVS/pharmacy and State Boards of Pharmacy expect of all Pharmacists.

Procedure:

### 1. EXPECTATIONS:

#### 1.1. ALL PHARMACY STAFF MEMBERS WILL:

- 1.1.1. Comply with the defined responsibilities and practices in the Professional Practices Section.
- 1.1.2. Adhere to all applicable State and Federal laws.
- 1.1.3. Protect the patient's right to confidentiality with regard to prescription records and health conditions, including all CVS/pharmacy policies and procedures for HIPAA compliance.
- 1.1.4. Ensure the accuracy of prescriptions dispensed.
- 1.1.5. Immediately notify their direct supervisor upon the discovery of all dispensing incidents
- 1.1.6. NOT make statements to any newspaper, publication, association, radio or television station regarding CVS policies or procedures.

## 2. PHARMACIST RESPONSIBILITIES

### 2.1. ALL PHARMACISTS ARE RESPONSIBLE FOR ALL ASPECTS OF PHARMACY OPERATIONS WITHIN THEIR STORE. THE INDIVIDUAL RESPONSIBILITIES INCLUDE:

- Serve and satisfy the customer's health care needs.
- Coordinate/implement the training and development of Pharmacy Support Staff.
- Conduct performance reviews and evaluations consistently for all Pharmacy Support Staff.
- Maintain a clean, organized and professional pharmacy department.
- Communicate with customers while protecting their Protected Health Information (PHI) in accordance with HIPAA guidelines and CVS Privacy Policies.
- Pharmacy Operations Policy and Procedure: Minimum Necessary Use and Disclosure of Protected Health information
- <http://apollo.cvs.com/internalaudit/administ/legal/HIPAA%20MinimumNecessaryTofC.htm>
- Establish, coordinate, and maintain the work schedule to best serve the needs of the customer and in accordance with budgeted payroll hours.
- Maintain inventory levels by following the pharmacy replenishment system guidelines.
- Continually communicate, and interact with all prescribers; including physicians, dentists, nurses, and others in the health care field in an effort to better serve the customer.
- Individually & collectively comply with all Federal and State laws, rules, and regulations.
- Individually and collectively operate and perform to company personnel and operational policies and procedures.
- Continually maintain a perpetual C-II inventory.
- Continually perform a C-II audit on a monthly basis or more often as State Law deems.

Reference: Pharmacy Operations Policy and Procedure:  
Schedule II Drugs  
[http://apollo.cvs.com/internalaudit/stores/rxops/21.htm#P5\\_0](http://apollo.cvs.com/internalaudit/stores/rxops/21.htm#P5_0)

- Seek out competitive information when requested by field management.
- Individually and collectively comply with all security/loss prevention procedures.
- Participate in CVS/pharmacy sponsored Community Programs.

- Help cover open shifts when needed, during times of operational need.

### **3. PROFESSIONAL PRACTICES**

#### **3.1. LEGAL RESPONSIBILITIES**

- It is the responsibility of every CVS Pharmacist, Support Staff, and other authorized personnel to observe all State and Federal laws.
- All appropriate licenses, diplomas, and registrations will be posted in the pharmacy in accordance with State regulations
- Employees are expected to fill and refill only legal and authorized prescriptions. They are expected to uphold this legal and moral responsibility by keeping up to date on all State and Federal changes in pharmacy jurisprudence.
- All Support staff and other authorized personnel perform only those tasks that are allowed by State and Federal law, supervised by a CVS Pharmacist.
- The Pharmacist and all licensed Pharmacy Staff will fulfill all requirements for continued licensing including timely renewal when necessary and completion of continuing education requirements.
- All licensed Pharmacy Staff will maintain their current License and Expiration Date information in the *RPH License Tracking Data Base* on RxNet.
- A copy of your current pharmacy license is to be forwarded to your Pharmacy Supervisor upon receipt or renewal.
- All registered and licensed Pharmacy Personnel are responsible for notifying the Board of Pharmacy of any change in name, address, and place of employment in accordance with State and Federal law.
- Pharmacy Support Personnel will fulfill all requirements for initial and continued licensing; including timely renewal and completion of Continuing Education requirements.
- Previous year's continuing education certificates must be retained and are to be made available to the Pharmacy Supervisor upon request.

### **4. CUSTOMER RELATIONS**

#### **4.1. All Pharmacists have a professional and moral responsibility to behave in a manner that considers the patient's welfare first.**

- All prescriptions are dispensed in a timely and accurate manner.
- Pharmacists are not to refuse to dispense legal prescriptions based on anything less than sound professional reasons such as DUR,

- documented dosage exceptions and consultation with all available medical resources and/or treating prescriber.
- All Pharmacists make a diligent effort to accommodate the customer whenever a "No Refill" situation arises so that an interruption to the patient's therapy does NOT occur. Unique situations may arise during the prescription filling process such as rush orders, price complaints, or last minute third party information. We must accommodate the customer as best we can.
  - Delays and interruptions in therapy are to be avoided if an out-of-stock situation exists.

## 5. PATIENT COUNSELING

5.1. All Pharmacists are expected to make themselves available to discuss all matters of healthcare with each patient, or their caregiver. This may include, but is not limited to, the route of administration, proper dosage, continuity of drug therapy, special directions for use, and possible adverse drug reactions. Additionally, the Pharmacist must be available and willing to consult on over-the-counter medications with the patient, or their caregiver.

## 6. CORRESPONDING RESPONSIBILITY

6.1. A *Pharmacist has a professional and legal responsibility to determine the medical necessity for all prescriptions.* The exercising of corresponding responsibility is especially important with regard to "questionable" prescriptions for controlled drugs. However, corresponding responsibility does NOT include the right to refuse to fill prescriptions based on anything less than sound professional judgment. *Blanket decisions based on a practitioner's prescribing habits or a customer's appearance are unprofessional and may be illegal.* Each prescription must be analyzed individually to determine its merit and medical necessity

## 7. PATIENT CONFIDENTIALITY

7.1. HIPAA, CVS policy, and State and Federal pharmacy laws protect a patient's right to confidentiality with regard to their prescription records and health conditions.

- Patient information must not be disclosed to unauthorized individuals.
- All pharmacy personnel are required to sign a Patient Confidentiality Statement.
- All pharmacy personnel are required to complete the appropriate level of HIPAA training as determined by their position.

## 8. DISPENSING PROCEDURES TO ENSURE ACCURACY

8.1. All Pharmacists are responsible for ensuring the accuracy of all prescriptions dispensed.

- All Patient demographic information is verified at Drop-Off.
- Hard copy prescriptions are to be scanned into the computer system.
- Label printing is limited to 3 families only.
- When filling the prescription, the NDC of the stock bottle is to be verified against the printed prescription label.
- The Technician must not put the stock bottle away for any drug without a Pill Image, until the Pharmacist has verified that prescription.
- Upon filling the prescription(s), the Technician is to place the filled prescription(s) in the appropriate colored basket and placed in the "Red Zone" awaiting Pharmacist Verification.
- Pharmacists are to use the "Verify" queue for all prescriptions.
- Pharmacists must review the scanned prescription image to ensure accuracy.
- Pharmacists must review all DUR's including informational.
- Only verified prescriptions are to be placed in the "Green Zone."
- All receipts are to be adhered to the front of the bag. Do not seal the bag.
- Upon dispensing a prescription, verify that the medication is being dispensed to the right patient by asking them for their address when they respond to the name called.

### 8.2. PHARMACIST'S RESPONSIBILITY IN THE EVENT OF A DISPENSING INCIDENT

- All Pharmacists must make every attempt to contact the patient and/or the prescriber to make sure the appropriate drug and counseling is given to the patient.
- The prescription is to be immediately corrected.
- An Attempt to obtain the incorrect medication should be made, BUT SHOULD NEVER STOP you from correcting the mistake and giving that to the patient.
- The Patient is to receive a complete refund regardless of cost.
- The Patient is to receive the completed and correct prescription at "No Charge."
- CONTACT AND NOTIFY THE PHARMACY SUPERVISOR IMMEDIATELY!

- If ingestion has occurred, or resolution with the patient or caregiver is not successful, the discovering Pharmacist must contact the Pharmacy Supervisor personally.
- If your Pharmacy Supervisor is not available, notify the Pharmacy Supervisor that is covering.
- NOTE: If Ingestion has occurred, a message on the phone-mail is NOT APPROPRIATE. You should make every attempt to contact your Pharmacy Supervisor and discuss this with him/her personally.
- The prescriber must also be notified immediately
  - If Ingestion HAS not occurred, contact your Pharmacy Supervisor via normal means.
  - The discovering Pharmacist must fill out the Prescription Incident Report via Quality First on RxNet within 24 hours.
- DO NOT PRINT OR SAVE ANY INCIDENT REPORTS.
- All Incident reports are to be completed on RxNet.
  - Failure to comply with these responsibilities may be considered a gross violation of company policy, and appropriate coaching and counseling will be administered.

Reference: Prescription Refunds/Incidents

[http://apollo.cvs.com/internalaudit/stores/rxops/20%20Prescription%20Refunds%20Incidents%2005%2023%2003.htm#P5\\_0](http://apollo.cvs.com/internalaudit/stores/rxops/20%20Prescription%20Refunds%20Incidents%2005%2023%2003.htm#P5_0)

## 9. PERSONAL APPEARANCE AND DRESS CODE

- All pharmacy personnel must wear a CVS smock and appropriate name badge.
- Pharmacists must wear the CVS Smock with the "CVS Pharmacist" designation on the sleeve, and name badge.
- In addition to the CVS Dress code Stated in "Your Guide to CVS", Pharmacy personnel must dress professionally and:
  - Males should wear a tie and females should dress appropriately for the pharmacy profession.
  - Footwear should cover the entire foot and sneakers are generally not appropriate. Exceptions to this policy are at the discretion of the Pharmacy Supervisor or the District Sales Manager.
  - Blue Jeans are never acceptable for Males or Females.

Reference: "Your Guide to CVS"

[http://cvsapp005/hrweb.nsf/LinksER/\\$file/Your+Guide+to+CVS.pdf](http://cvsapp005/hrweb.nsf/LinksER/$file/Your+Guide+to+CVS.pdf)

## 10. ACCOMMODATION SALES FROM OTHER PHARMACIES

10.1. It is CVS Policy:

- NOT to allow other pharmacies and/or sales representatives to exchange or purchase merchandise, other than at full retail price.
- CVS Pharmacies are not to allow the purchase or exchange of merchandise from other pharmacies, sales representatives or any members of the medical profession.
- You may only transfer prescription merchandise between CVS Pharmacies in accordance with CVS Store to Store transfer policy when allowed by State law.

Reference: Store to Store Transfers  
[http://storesweb01/RxNet\\_operations/rim/8-  
Store to Store Transfer.htm](http://storesweb01/RxNet_operations/rim/8-Store_to_Store_Transfer.htm)

- If a surrounding CVS Pharmacy cannot accommodate that patient's specific request, you may transfer that prescription to a competitor for the Patient's immediate Health Care needs.

## 11. STATEMENTS TO THE PRESS

- No Statements are to be made by any CVS/pharmacy employee to any newspaper, publication, association, radio or television station regarding CVS policies or procedures.
- All requests for such Statements must be referred to your immediate Supervisor and/or the Director of Corporate Communications.

## 12. SURVEY FORMS FROM OTHER COMPANIES

- Survey forms/questionnaires from other companies received at the store requesting ANY information should NOT be completed.
- ALL surveys and any related compensations should be forwarded to the corporate office.

## 13. Conscience Policy – This policy supersedes all prior communication on this issue.

A. Religious Accommodation Regarding Dispensing of Prescriptions  
It is CVS policy that our pharmacists are responsible for ensuring that all customers' pharmacy needs are promptly and completely satisfied. CVS recognizes that some pharmacists may have sincere religious convictions which prevent them from filling certain prescriptions, or which conflict with other job requirements. Pharmacists must submit a request for a religious accommodation to their Pharmacy Supervisor and Area Human Resources Director before they are in a situation where they may be

asked to fill a prescription that they object to dispensing. A form for requesting a religious accommodation is set forth on the following page.

After CVS receives a request for a religious accommodation, the company will determine whether an accommodation can be granted. All accommodations must be approved by a Pharmacy Supervisor and an Area HR Director, and must ensure that the needs of the patient are satisfied promptly.

**B. Providing Medications Available Without a Prescription**

In the event that a Pharmacist or Pharmacy Staff Member has a concern about providing medication that is available to customers without a prescription, it is the responsibility of the Pharmacy Manager, Pharmacist in Charge, or Pharmacist on Duty to arrange for another member of the pharmacy staff, or if necessary someone from the front store staff, to service the customer.

Customers requesting medications that are available without a prescription must be served promptly and respectfully, and may not be referred to another store due to a Pharmacist or Pharmacy Staff member's personal or religious objections.

**C. Obligation**

Pharmacists and Pharmacy Staff Members may not discuss their moral or religious objections to filling a prescription with CVS customers.

It is CVS's policy to comply with all applicable laws concerning religious accommodations and/or conscience statutes relating to pharmacists; this policy is not intended to conflict with any applicable state or federal law.

Attachments: Pharmacist Religious Accommodation Form

Approved By: Operational Review Committee

Date: 12/01/06

Form for Requesting a Religious Accommodation Regarding Dispensing of Prescriptions

To:

\_\_\_\_\_, R.Ph., Rx

Supervisor  
and

\_\_\_\_\_, Area Human  
Resources Director

From: \_\_\_\_\_, R.Ph. Store

# \_\_\_\_\_

Subject: Request for Religious Accommodation regarding the dispensing of prescriptions

Date: \_\_\_\_\_

1. Please identify your religion:

2. Please identify the work rule or requirement with respect to which you need an accommodation:

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3. Please describe your religious belief or practice that is in conflict with this work rule or requirement:

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4. Please identify any accommodations that you feel could be taken to resolve the conflict between your religious belief or practice and the work rule or requirement described above:

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